

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIACOM INTERNATIONAL, INC., COMEDY )  
PARTNERS, COUNTRY MUSIC. )  
TELEVISION, INC., PARAMOUNT )  
PICTURES CORPORATION, and BLACK )  
ENTERTAINMENT TELEVISION, LLC, )

Plaintiffs, )

vs. )

NO. 07-CV-2103

YOUTUBE, INC., YOUTUBE, LLC, )  
and GOOGLE, INC., )

Defendants. )

THE FOOTBALL ASSOCIATION PREMIER )  
LEAGUE LIMITED, BOURNE CO., et al., )  
on behalf of themselves and all )  
others similarly situated, )

Plaintiffs, )

vs. )

NO. 07-CV-3582

YOUTUBE, INC., YOUTUBE, LLC, and )  
GOOGLE, INC., )

Defendants. )

VIDEOTAPED DEPOSITION OF VANCE IKEZOYE  
PALO ALTO, CALIFORNIA  
THURSDAY, SEPTEMBER 10, 2009

JOB NO. 17619

Figueira Decl. Tab

53

1 IKEZOYE, V. 53-0002

2 You were CCed on it.

3 A Yeah, I believe it was a great licensing  
4 agreement between the companies.

5 Q Between what companies?

6 A YouTube and content owners.

7 Q Okay. So your understanding of the  
8 arrangement -- is it your understanding of the  
9 arrangement that as YouTube signed new contracts with  
10 content owners, YouTube would then request that that  
11 content owners' fingerprints be put into the YouTube  
12 custom database?

13 MS. REES: Objection; calls for speculation;  
14 hypothetical.

15 THE WITNESS: That was my understanding, and  
16 yes.

17 MR. DESANCTIS: Okay.

18 Q Is that -- is that hypothetical, or is that  
19 actually what happened, if you know?

20 MS. REES: Objection; calls for speculation.

21 THE WITNESS: I know, in general, that the  
22 database was a subset. I don't know if every piece of  
23 content in there was related to a company that had a  
24 licensing agreement.

25 MR. DESANCTIS: Okay.